

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ENCOMPASS INSURANCE COMPANY OF
MASSACHUSETTS,

CIVIL ACTION NO.:

Plaintiff,

vs.

JOSEPH D. GIAMPA, FREDERICK T.
GIAMPA, ADVANCED SPINE CENTERS,
INC. D/B/A FIRST SPINE REHAB, FUTURE
MANAGEMENT CORPORATION,
EDWARD KENNEDY, BRIAN J.
CULLINEY, D.C. AND JENNIFER
McCONNELL, D.C.

05 - 11693 RCL

Defendants.

CERTIFICATE OF NO LIABILITY INSURANCE

I, Richard D. King, Jr., counsel for the plaintiff in the above-captioned matter, hereby certify that:

- (1) Neither I nor the plaintiff are aware of any liability insurance available to satisfy the Judgment sought in this matter.
- (2) Neither I nor the plaintiff have any reason to believe that there will be any liability insurance available to satisfy the Judgment sought in this matter as the Complaint alleges willful and knowing violations of civil conspiracy, and common law fraud.

Respectfully Submitted
Encompass Insurance Company,
By its Attorneys,


Richard D. King, Jr.
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Nathan A. Tilden
BBO No.: 647076
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Dated: August 16, 2005